

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BINYAMIN ABELES,

Plaintiff,

ANSWER

-against-

12 CV 2232

INDEPENDENT RECOVERY RESOURCES, INC.,
Defendant(s).

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Defendant, INDEPENDENT RECOVERY RESOURCES, INC., by their attorney, MEL
S. HARRIS AND ASSOCIATES, LLC, answers plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt
Collection Practices Act, but denies any violation thereof.

2. Defendant denies knowledge or information sufficient to form a
belief as to the allegations contained in paragraph "2" of the complaint.

3. Defendant admits to the allegations contained in paragraph "3"
of the complaint.

4. Defendant admits to the allegations contained in paragraph "4"
of the complaint.

5. Defendant admits that it is located in Patchogue, New York.

6. Defendant admits to the allegations contained in paragraph "6"
of the complaint.

7. Defendant admits to the allegations contained in paragraph "7"
of the complaint.

8. Defendant admits to the allegations contained in paragraph "8"
of the complaint.

9. Defendant admits to the allegations contained in paragraph "9"
of the complaint.

10. Defendant admits to the allegations contained in paragraph "10" of the complaint.

11. Defendant admits contacting the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "11" of the complaint.

12. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. This paragraph does not contain any factual allegations directed to the defendant and does not require an admission or denial.

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant denies each and every allegation contained in paragraph "17" of the complaint.

18. Defendant denies each and every allegation contained in paragraph "18" of the complaint.

19. Defendant denies each and every allegation contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. Defendant denies each and every allegation contained in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. Defendant re-alleges all previous admissions and denials contained in paragraphs "1" through "25" of the complaint.

27. Defendant denies each and every allegation contained in paragraph "27" of the complaint.

28. Defendant denies each and every allegation contained in paragraph "28" of the complaint.

29. Defendant denies each and every allegation contained in paragraph "29" of the complaint.

30. Defendant denies each and every allegation contained in paragraph "30" of the complaint.

31. Defendant denies each and every allegation contained in paragraph "31" of the complaint.

32. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in "32" of the complaint.

33. Defendant denies each and every allegation contained in paragraph "33" of the complaint.

34. Defendant denies each and every allegation contained in paragraph "34" of the complaint.

WHEREFORE, the Defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
June 14, 2012



Arthur Sanders (AS1210)
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